PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor:	Gerald Altman	§	Atty.Dkt.No.: 5957-72402
Serial Number:	10/667,401	§	Examiner: Lovel, Kimberly M.
Filing Date:	September 23, 2003	§	Group/Art Unit: 2167
Title:	DATABASE SYSTEMS AND PROCESSES FOR STORAGE AND RETRIEVAL OF ELECTRONIC AND RELATED DOCUMENTS	§	Conf. No.: 9364

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On: October 5, 2011 (Date) /Alex A. Courtade/ Alex A. Courtade, # 65,635

APPEAL BRIEF

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir/Madam:

Further to the Notice of Appeal filed July 28, 2011, the Advisory Action mailed July 1, 2011, and the Final Office Action mailed April 28, 2010, Appellant presents this Appeal Brief. This Appeal Brief is filed within one month of September 28, 2011; accordingly, a one month extension of time is requested. Appellant respectfully requests that the Board of Patent Appeals and Interferences consider this appeal.

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I. REAL PARTY IN INTEREST

The subject application is owned by New Grounds LLC, a corporation organized and existing under and by virtue of the laws of the State of Nevada, and now having its principal place of business at 2215-B Renaissance Dr., Suite 5, Las Vegas, NV 89119.

II. RELATED APPEALS AND INTERFERENCES

An Appeal Brief was filed in U.S. Application 10/914,481 on October 18, 2010. An Appeal Brief was also filed in U.S. Application 11/513,846 on March 4, 2011. Those appeals may be related to, directly affect, or be directly affected by or have a bearing on the Board's decision in this appeal. As of this brief's date of filing, no decision has been reached in the appeals of either the '481 application or the '846 application.

III. STATUS OF CLAIMS

Claims 1-23, 31, 32, 34, 37-40, 46, 47, 55, 64, and 73-75 are canceled. Claims 24-30, 33, 35, 36, 41-45, 48-54, 56-63, 65-72, and 76-79 are pending in the case.

All pending claims stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Irons et al. (U.S. Pub. No. 2002/0111960) in view of Vanko et al. (U.S. 5,557,512) and in further view of Bennett (U.S. 5,615,367). Final Office Action at 4. All pending claims (24-30, 33, 35, 36, 41-45, 48-54, 56-63, 65-72, and 76-79) are the subject of this appeal. A copy of claims 24-30, 33, 35, 36, 41-45, 48-54, 56-63, 65-72, and 76-79, incorporating entered amendments, as on appeal, is included in the Claims Appendix hereto.

IV. STATUS OF AMENDMENTS

Appellant submitted after-final amendments in a Response to the Final Office Action of April 28, 2011. These amendments were entered by the Examiner in an Advisory Action of July 1, 2011.

V. SUMMARY OF THE CLAIMED SUBJECT MATTER

The present application relates to the field of storage and retrieval of electronic documents and, in some embodiments, systems and processes in which attributes for an electronic document are stored in a database and are accessible via a generated, unique time-based identifier identifying a date and time of day that an electronic document was received by a computer system.

Independent claim 24 is a method. Independent claims 41 and 48 are document management systems. Independent claim 56 is a tangible computer readable memory medium having instructions stored thereon.

Each of these claims is summarized below, with citations to corresponding portions of the specification and drawings as required by 37 C.F.R. § 41.37(c)(1)(v). These citations are provided to illustrate specific examples and embodiments of the recited claim language, and are not intended to limit the claims.

Claim 24

Claim 24 recites a method, comprising:

receiving a succession of electronic documents {e.g., p. 3, line 15 to p. 4, line 9; p. 6, lines 11-20; p. 7, line 21 to p. 8, line 11} into a computer system {e.g., Fig. 1, elements 26 and/or 30; p. 6, line 6 to p. 8, line 11}, wherein each of the succession of electronic documents is received at a corresponding point in time{e.g., p. 6, lines 13-16; p. 7, line 17 to p. 8, line 8; p. 9, line 20 to p. 10, line 10}; and

for each of at least a subset of the received electronic documents:

the computer system generating a corresponding unique time-based identifier identifying a date and time of day that the electronic document was received by the computer system {e.g., p. 7, lines 14-25; p. 9, line 20 to p. 10, line 10; p. 14, line 14 to p. 15, line 2; p. 15, lines 23-25};

the computer system storing, in an electronic storage {e.g., Fig. 1, elements 68; p. 10, lines 11-26}, a respective plurality of attributes {e.g., Figs. 6-11; p. 4, lines 10-20; p. 7, lines 5-13; p. 12, line 8 to p. 16, line 16} relating to the electronic document in each of a plurality of tables of a relational database accessible to the computer system {e.g., *id.*; }, wherein at least one of the plurality of tables {e.g., Fig. 7;

p. 12, line 17 to p. 13, line 19} includes the generated unique time-based identifier as one of its respective plurality of attributes {e.g., Figs. 7-11 ("Entry_Date/Time" label in each figure); p. 12, line 17 to p. 13, line 19}, wherein each of the plurality of tables is accessible using the generated unique time-based identifier {e.g., Figs. 7-11 ("Entry_Date/Time" label in each figure); p. 12, lines 8-16; p. 15, lines 3-15; p. 16, lines 5-16}, and wherein at least one of the plurality of tables includes a first attribute containing information indicating a location of a physical document corresponding to the electronic document {e.g., Figs. 8 and 11, "Physical_Location" label; p. 7, lines 14-25; p.8, line 16 to p. 10, line 10; p. 13, line 20 to p. 14, line 6}; and

the computer system accessing the plurality of attributes for the electronic document in at least one of the plurality of tables using the corresponding unique time-based identifier for the electronic document {e.g., p. 12, line 8 to p. 16, line 16; p. 3, line 13 to p. 4, line 20}.

Claim 41

Claim 41 recites a document management system {e.g., Fig. 1 elements 20, 22, 24, and/or 26} comprising:

an input unit {e.g., Fig. 1, elements 32, 42, 44, and/or 46} configured to receive a succession of electronic documents {e.g., p. 3, line 15 to p. 4, line 9; p. 6, lines 11-20; p. 7, line 21 to p. 8, line 11}, wherein each of the succession of electronic documents is received at a corresponding point in time {e.g., p. 6, lines 13-16; p. 7, line 17 to p. 8, line 8; p. 9, line 20 to p. 10, line 10};

a storage subsystem {e.g., Fig. 1, elements 26, 30, 38, and/or 40; p. 3, lines 15-26; p. 6, line 11 to p. 7, line 4; p. 10, lines 16-18} coupled to the input unit {e.g., *id.*} and configured to store the succession of electronic documents in an electronic storage {e.g., Fig. 1, elements 68; Fig. 5, element 68; p. 10, line 11 to p. 12, line 7} using corresponding unique time-based identifiers {e.g., *id.*; p. 12, line 8 to p. 13, line 7; p. 14, line 14 to p. 15, line 15};

a computer system {e.g., Fig. 1, elements 26, 38 and/or 40; p. 6, lines 11-24; p. 7, line 5 to p. 8, line 11} coupled to both the input unit and the storage subsystem {e.g., *id.*}

wherein the computer system is configured, for each of at least a subset of the received electronic documents, to:

generate a unique time-based identifier corresponding to the point in time at which the electronic document was received into the document management system {e.g., p. 7, lines 14-25; p. 9, line 20 to p. 10, line 10; p. 14, line 14 to p. 15, line 2; p. 15, lines 23-25};

use the unique time-based identifier to store the electronic document in the storage subsystem {e.g., *id.*; p. 15, line 16 to p. 16, line 16}; and

store a respective plurality of attributes {e.g., Figs. 6-11; p. 4, lines 10-20; p. 7, lines 5-13; p. 12, line 8 to p. 16, line 16} relating to the electronic document in each of a plurality of tables of a relational database {e.g., *id.*}, wherein at least one of the plurality of tables {e.g., Fig. 7; p. 12, line 17 to p. 13, line 19} includes the unique time-based identifier for the electronic document as one of its respective attributes {e.g., Figs. 7-11 ("Entry_Date/Time" label in each figure); p. 12, line 17 to p. 13, line 19}, wherein each of the plurality of tables is accessible using the generated unique time-based identifier {e.g., Figs. 7-11 ("Entry_Date/Time" label in each figure); p. 12, lines 8-16; p. 15, lines 3-15; p. 16, lines 5-16}, and wherein at least one of the plurality of tables includes a first attribute containing information indicating a location of a physical document corresponding to the electronic document {e.g., Figs. 8 and 11, "Physical_Location" label; p. 7, lines 14-25; p.8, line 16 to p. 10, line 10; p. 13, line 20 to p. 14, line 6}; and

access the plurality of attributes for the electronic document in at least one of the plurality of tables using the corresponding unique time-based identifier for the electronic document {e.g., p. 3, line 13 to p. 4, line 20; p. 12, line 8 to p. 16, line 16}; and

wherein the electronic storage is configured to retrieve the succession of electronic documents using corresponding unique time-based identifiers {e.g., abstract; p. 12, line 8 to p. 13, line 7; p. 15, lines 3-8; p. 15, line 19 to p. 16, line 16; claims 1-3 as filed}.

Claim 48

Claim 48 recites a document management system {e.g., Fig. 1 elements 20, 22, 24, and/or 26}, comprising:

first means {e.g., Fig. 1, elements 32, 42, 44, and/or 46} for receiving a succession of electronic documents into a document management system {e.g., p. 3, line 15 to p. 4, line 9; p. 6, lines 11-20; p. 7, line 21 to p. 8, line 11}, wherein each of the succession of electronic documents is received at a corresponding point in time {e.g., p. 6, lines 13-16; p. 7, line 17 to p. 8, line 8; p. 9, line 20 to p. 10, line 10};

second means {e.g., Fig. 1, elements 26, 38 and/or 40; p. 6, lines 11-24; p. 7, line 5 to p. 8, line 11} for generating a unique time-based identifier for each of at least a subset of the received electronic documents {e.g., p. 7, lines 14-25; p. 9, line 20 to p. 10, line 10; p. 14, line 14 to p. 15, line 2; p. 15, lines 23-25}, wherein the time-based identifier for each of at least a subset of the received electronic documents corresponds to a point in time at which the corresponding electronic document was received {e.g., *id.*}, wherein the second means is coupled to the first means {e.g., Fig. 1};

third means {e.g., Fig. 1, elements 26, 30, 38, and/or 40} for storing each of at least a subset of the received electronic documents using the corresponding time-based identifier { p. 3, lines 15-26; p. 6, line 11 to p. 7, line 4; p. 10, line 11 to p. 13, line 7; p. 14, line 14 to p. 15, line 15}, wherein the third means is coupled to the second means {e.g., Fig. 1; p. 10, lines 16-18};

wherein the third means is configured to store, for each of the at least a subset of the received electronic documents, a respective plurality of attributes {e.g., Figs. 6-11; p. 4, lines 10-20; p. 7, lines 5-13; p. 12, line 8 to p. 16, line 16} relating to that electronic document in each of a plurality of tables of a relational database {e.g., *id.*}, wherein at least one of the plurality of tables {e.g., Fig. 7; p. 12, line 17 to p. 13, line 19} includes the generated unique time-based identifier as one of its respective plurality of attributes {e.g., Figs. 7-11 ("Entry_Date/Time" label in each figure); p. 12, line 17 to p. 13, line 19}, wherein each of the plurality of tables is accessible using the generated unique time-based identifier {e.g., Figs. 7-11 ("Entry_Date/Time" label in each figure); p. 12, lines 8-16; p. 15, lines 3-15; p. 16, lines 5-16}, and wherein at least one of the plurality of tables includes a first attribute containing information indicating a location of

a physical document corresponding to that electronic document {e.g., Figs. 8 and 11, "Physical_Location" label; p. 7, lines 14-25; p.8, line 16 to p. 10, line 10; p. 13, line 20 to p. 14, line 6}; and

fourth means {e.g., Fig. 1, elements 26, 30, 38, and/or 40} for accessing, for a given one of the succession of electronic documents, the respective plurality of attributes for the given document in at least one of the plurality of tables using the corresponding unique time-based identifier for the given electronic document {e.g., abstract; p. 3, line 13 to p. 4, line 20; p. 12, line 8 to p. 13, line 7; p. 15, lines 3-8; p. 15, line 19 to p. 16, line 16; claims 1-3 as filed}.

Claim 56

Claim 56 recites a tangible computer readable memory medium {e.g., Fig. 1, elements 38, 40, 64, and/or 66; p. 6, line 6 to p. 8, line 11} having instructions stored thereon that are executable by a computing device {e.g., Fig. 1, elements 26 and/or 30; p. 6, line 6 to p. 8, line 11} to cause the computing device to:

receive a succession of electronic documents {e.g., p. 3, line 15 to p. 4, line 9; p. 6, lines 11-20; p. 7, line 21 to p. 8, line 11} into a document management system {e.g., Fig. 1 elements 20, 22, 24, and/or 26}, wherein each of the succession of electronic documents is received at a corresponding point in time {e.g., p. 6, lines 13-16; p. 7, line 17 to p. 8, line 8; p. 9, line 20 to p. 10, line 10};

generate a unique time-based identifier for each of at least a subset of the received electronic documents {e.g., p. 7, lines 14-25; p. 9, line 20 to p. 10, line 10; p. 14, line 14 to p. 15, line 2; p. 15, lines 23-25}, wherein each unique time-based identifier corresponds to the point in time at which the corresponding electronic document was received {e.g., *id.*};

store, in an electronic storage {e.g., Fig. 1, elements 68; Fig. 5, element 68; p. 10, line 11 to p. 12, line 7}, and for at least one of at least the subset of the received electronic documents, a respective plurality of attributes {e.g., Figs. 6-11; p. 4, lines 10-20; p. 7, lines 5-13; p. 12, line 8 to p. 16, line 16} relating to the at least one electronic document in each of a plurality of tables of a relational database accessible to the computing device {e.g., *id.*}, wherein at least one of the plurality of tables {e.g., Fig. 7; p. 12, line 17 to p. 13, line 19} includes as one of its respective plurality of attributes the

unique time-based identifier corresponding to the at least one electronic document {e.g., Figs. 7-11 ("Entry_Date/Time" label in each figure); p. 12, line 17 to p. 13, line 19}, wherein each of the plurality of tables is accessible using the generated unique time-based identifier {e.g., Figs. 7-11 ("Entry_Date/Time" label in each figure); p. 12, lines 8-16; p. 15, lines 3-15; p. 16, lines 5-16}, and wherein at least one of the plurality of tables includes a first attribute containing information indicating a location of a physical document corresponding to the at least one electronic document {e.g., Figs. 8 and 11, "Physical_Location" label; p. 7, lines 14-25; p.8, line 16 to p. 10, line 10; p. 13, line 20 to p. 14, line 6}; and

access the plurality of attributes for the at least one of the received electronic documents in at least one of the plurality of tables using the corresponding unique time-based identifier for the at least one electronic document {e.g., p. 3, line 13 to p. 4, line 20; p. 12, line 8 to p. 16, line 16}.

* * *

The summary above describes various examples and embodiments of the claimed subject matter; however, the claims are not necessarily limited to any of these examples and embodiments. The claims should be interpreted based on their respective wordings.

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

The Examiner rejected claims 24-30, 33, 35, 36, 41-45, 48-54, 56-63, 65-72, and 76-79 under 35 U.S.C. § 103(a) as being obvious in view of a proposed combination of Irons et al. (U.S. Pub. No. 2002/0111960), Vanko et al. (U.S. 5,557,512), and Bennett (U.S. 5,615,367).

VII. ARGUMENT

Rejections Under 35 U.S.C. § 103(a) in view of Irons, Vanko, and Bennett

(A) Independent Claims 24, 41, 48, and 56

The Examiner rejected all independent claims (24, 41, 48, and 56) under 35 U.S.C. § 103(a) as being unpatentable over a proposed combination of Irons, Vanko, and Bennett. Final Office Action at 4.

Appellant respectfully submits that the "differences between the subject matter sought to be patented and the prior art" are not "such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains." *See* 35 U.S.C. § 103(a). Appellant submits that the claims represent "improvement[s] [that are] more than the predictable use of prior art elements according to their established functions." *See* MPEP § 2141 (quoting *KSR Int'l Co. v. Teleflex, Inc.*, 550 U.S. 398 (2007)). Appellant also submits that no motivation exists to combine the references in the manner suggested by the Examiner. *See id.* Appellant further respectfully asserts that each and every element of the claims is not taught or suggested by the cited references. *See* MPEP § 2143.03. Accordingly, the rejections are traversed for at least the reasons set forth below.

Claims 24, 41, 48, 56, and their respective dependent claims (excepting claims 27 and 60) stand or fall with representative claim 24, which recites as follows:

> 24. A method, comprising:
>
> receiving a succession of electronic documents into a computer system, wherein each of the succession of electronic documents is received at a corresponding point in time; and
>
> for each of at least a subset of the received electronic documents:
>
> the computer system generating a corresponding unique time-based identifier identifying a date and time of day that the electronic document was received by the computer system;
>
> the computer system storing, in an electronic storage, a respective plurality of attributes relating to the electronic document in each of a plurality of tables of a relational database accessible to the computer system, wherein at least one of the plurality of tables includes the generated unique time-based identifier as one of its respective plurality of attributes, wherein each of the plurality of tables is accessible using the generated unique time-based identifier, and wherein at least one of the

> plurality of tables includes a first attribute containing information indicating a location of a physical document corresponding to the electronic document; and
>
> the computer system accessing the plurality of attributes for the electronic document in at least one of the plurality of tables using the corresponding unique time-based identifier for the electronic document.

Appellant submits the Examiner has failed to establish a *prima facie* case of obviousness with respect to claim 24. Even assuming that a motivation exists to combine Irons, Vanko, and Bennett—a proposition with which Applicant disagrees—the proposed combination fails to teach or suggest "receiving a succession of electronic documents into a computer system, wherein each of the succession of electronic documents is received at a corresponding point in time," and "for each of at least a subset of the received electronic documents," "generating a corresponding unique time-based identifier identifying a date and time of day that the electronic document was received by the computer system," as is recited by claim 24.

The Irons Reference Does Not Teach or Suggest a "Unique Time-Based Identifier Identifying a Date and Time of Day That [an] Electronic Document Was Received"

Irons states that it "provide[s] a complete solution for indexing documents, imaging/scanning documents, storing documents, and retrieving documents." *See* Irons at col. 6, lines 25-28. Thus, in Irons's system, "attaching a pre-printed, globally unique document identifier to a paper-based document [is performed] prior to scanning" of the document. *See id.* at col. 6, lines 42-44 . Irons also teaches "electronically storing the document using the document identifier contained in the [pre-printed] label." *See id.* at col. 6, lines 36-38.

The Examiner concedes, however, that Irons's "globally unique document identifier" "fails to explicitly disclose," as recited by claim 24, a "unique time-based identifier identifying a date and time of day that [an] electronic document was received by [a] computer system." *See* Final Office Action at 5-6. The Examiner thus turns to Vanko to provide further support for the rejection. *See id.* at 6.

Vanko Teaches a Manufacturing Production Line in Which Defect Data is Collected

As will be seen below, Vanko fails to remedy Irons's defects. Vanko's background states that in a "manufacturing environment, monitoring a production process and collecting statistical information on the status of the production process is considered essential." Vanko at col. 1, lines 16-19 (emphasis added). Accordingly, Vanko discloses "an apparatus and method employed on a production line for the automatic entry of data." *Id.* at col. 1, lines 10-14.

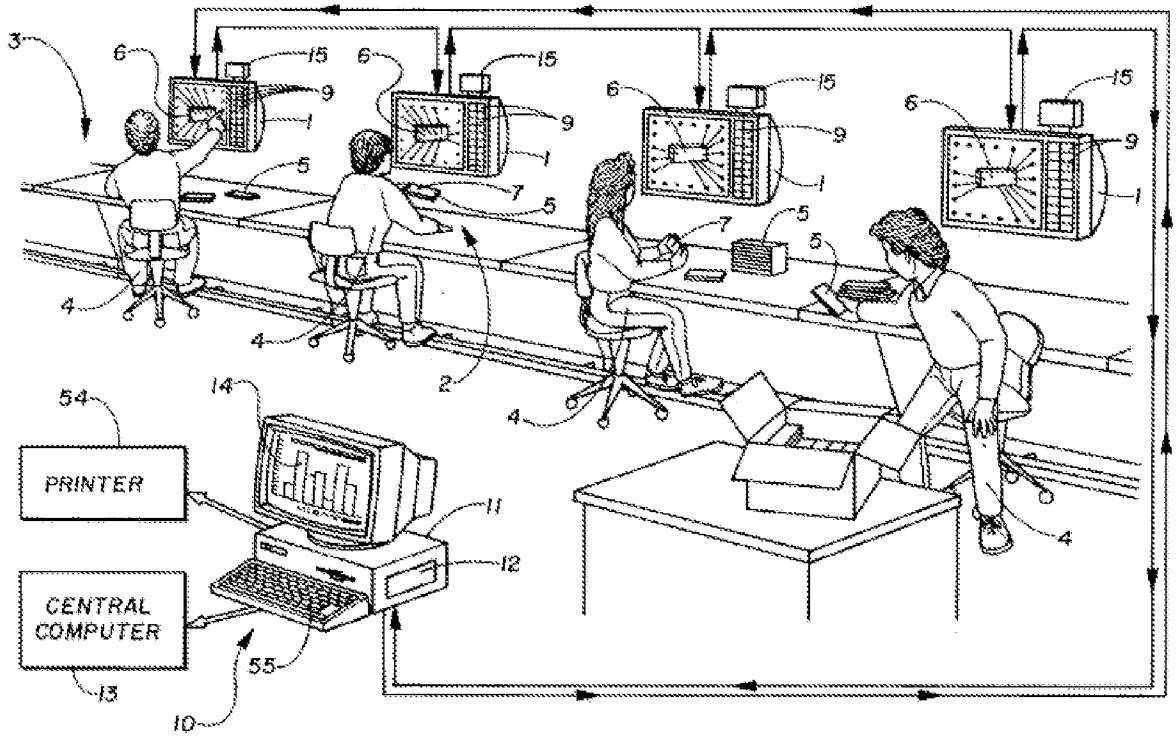

FIG. 1

Vanko's Fig. 1 (Showing a Production Line, a Computer 11, and a Data Entry Means 1)

Vanko notes that "defect[s] occurring in a workpiece" can be recorded, for example, using "a brief written identification of each occurred defect." *See id.* at col. 1, lines 21-24. Accordingly, Vanko teaches that a "data entry means 1" is "continuously connected to [a] computer 11." *Id.* at col. 6, lines 59-62. The computer is "used to continuously display defect data in real-time." *Id.* In Vanko's "production line" (shown above), "each operator 4 inspects a workpiece 5." *See id.* at col. 3, lines 4-6. If the "operator 4 finds a defect 7 in the workpiece 5, he (or she) touches (or presses) one of

indicia 8" to indicate "a position of the defect." *See id.* at col. 3, lines 7-10. The operator also touches "one of indicia 9" to indicate the "type-of-error." *See id.* Accordingly, Vanko describes a process in which a production line operator manually generates defect data. *See id.*

Vanko further teaches that defect data may be saved to a file. In Vanko's system, for example, "data are [periodically] up-loaded into the computer 11" by "pressing a [data] DUMP key" "at the end of the shift." *See* Vanko at col. 10, lines 42-46. Accordingly, "defect data" generated during a shift may thus be "written to [a] file." *See id.* at col. 12, lines 44-45.

This data file may have a "name [that] reflects [a] time and date." *See id.* at col. 12, lines 43-44. More particularly, Vanko teaches a file name format in which the first six characters of the file name represent the "year," "month," and "day." *See id.* at col. 15, lines 56-65. Vanko further teaches that

> the extension of the file name is the time. The first two characters [of the file extension] represent the hour in military time, like 15 for 3:00 pm and 06 for 6:00 am. The third and last character represents the tens of minutes past the hour, like 1 for the period 3:10 through 3:19. Thus the file name, recorded on May the third, 1994, at 3:09 pm, would be 940503.150.

Id. at col. 15, line 66 to col. 16, line 5. Accordingly, Vanko teaches a naming scheme in which a file containing defect data related to a production line receives a name that consists of a date and a time (accurate to the nearest 10 minute interval).

The Examiner asserts that if Vanko were combined with Irons, its file naming scheme would teach a "unique time-based identifier [that] identifies a date and time of day corresponding to the point in time at which [an] electronic document was received by the computer system." *See* Final Office Action at 6. However, as seen below, the teachings of Vanko do not remedy the admitted deficiencies of the Irons reference.

No Motivation Exists to Combine Irons and Vanko as Suggested by the Examiner

Appellant first respectfully submits that no motivation exists to combine Irons with Vanko as suggested by the Examiner. For example, the Examiner asserts that "one

would have been motivated" to combine Irons with Vanko "since the identifier of Irons can be anything that identifies the document and a time-based identifier provides a unique identifier." *See* Final Office Action at 6. As explained below, however, this statement does not rise to the level of "articulated reasoning" that is required to "support the legal conclusion of obviousness." *See* MPEP § 2141(III) (quoting KSR, 550 U.S. 398, 409, 82 USPQ2d 1385, 1396 (2007)).

Irons is directed to a "digital filing system" that provides for "indexing, imaging, storing, retrieving, and managing paper-based documents." *See* Irons Abstract. In contrast, Vanko teaches a "method employed on a production line for the automatic entry of data." *See* Vanko at col. 1, lines 10-13. And while Irons notes that "the lack of an efficient, cost-effective, adaptable method for driving paper through the scan and index process continues to thwart" "efforts ... to adopt wide-reaching document imaging solutions," Irons at col. 2, lines 43-47, Vanko is instead concerned with "collecting statistical information on the status of the production process" in a "manufacturing environment," *see* Vanko at col. 1, lines 17-20.

Appellant respectfully submits that a person of ordinary skill in the art of "digital filing system[s]," Irons Abstract, would not look to Vanko as suggested by the Examiner, see Final Office Action at 5-6. Likewise, a person of ordinary skill in the art of "automatic entry of data" "on a production line," Vanko at col. 1, lines 10-13, would not turn to Irons, *e.g.*, for that reference's ability to "stor[e], retriev[e], and manag[e] paper-based documents," see Irons Abstract (emphasis added). The mere fact that Irons and Vanko may both involve "data entry" in some form or other, *see* Final Office Action at 27-28, is insufficient to provide the motivation needed to combine these references as the Examiner suggests, *see* MPEP § 2141(III).

Nonetheless, the proposed combination of Irons and Vanko is defective for additional reasons.

Even Assuming a Motivation to Combine Irons and Vanko, the Proposed Combination Fails to Teach or Suggest the Elements of Claim 24

The Examiner appears to suggest that in the proposed combination of Irons and Vanko, the "pre-printed, globally unique document identifier" of Irons, *see* Irons at col. 6, lines 42-43, would be replaced with an identifier that uses Vanko's file-naming scheme. *See* Final Office Action at 5-6. Appellant strongly disagrees.

Irons's "identifier" is applied to "a paper-based document." See Irons at col. 6, lines 42-43. In contrast, Vanko's file-naming scheme for manufacturing defect data is merely applied, for example, "at the end of a shift" when a "DUMP key 53 is activated." *See* Vanko at col. 10, lines 42-44. An electronic "file name" assigned "at the moment ... [a] button was activated," for example, *see* Vanko at col. 15, lines 57-59, would not be viewed by a person having ordinary skill in the art as a teaching or suggestion to be used with Iron's "pre-printed labels, [in which] the nature of the globally unique, document identifier allows the labels to be attached to different types of documents without any predetermined relationship between the document, the document's content, and the pre-printed label," see Irons at col. 6, lines 49-53 (emphasis added).

Appellant thus disagrees with the Examiner's apparent suggestion that Vanko's electronic file name should be applied to the pre-printed label of Irons. *See, e.g.,*. Final Office Action at 27-28. However, Appellant submits—and the Examiner concedes—that Irons's pre-printed label does not teach or suggest a "corresponding unique time-based identifier identifying a date and time of day that [an] electronic document was received by [a] computer system," as recited by claim 24. *See* Final Office Action at 5-6. Thus, it is unclear precisely what kind of scheme the Examiner envisions. For example, while the Examiner asserts that "the different between Irons and Vanko is the naming scheme utilized," *see id.* at 28, Appellant submits that the differences between these references are far greater than the Examiner would admit. Indeed, no compelling explanation has been provided as to how *a pre-printed label* could be combined with Vanko's file name to teach or suggest claim 24's "corresponding unique time-based identifier identifying a date and time of day that [an] electronic document was received by [a] computer system" (emphasis added). *See, e.g., id.* at 27-29.

Accordingly, even if a motivation to combine Irons and Vanko existed, such a combination would fail to teach or suggest the elements of claim 24 asserted by the Examiner.

Bennett Does Not Remedy the Defects of Irons and Vanko

The remaining reference used by the Examiner to reject claim 24 (Bennett) fails to cure the above-noted defects of Irons and Vanko. Indeed, the Examiner does not cite Bennett for any teaching relating to "generating a corresponding unique time-based identifier identifying a date and time of day that the electronic document was received by the computer system" as recited by claim 24. *See* Final Office Action at 6. Instead, Bennett is simply referred to for the proposition of "the use of a relational database" in the proposed combination (apparently, as opposed to a non-relational database). *See id.* Appellant thus respectfully submits that Bennett does not teach or suggest any of the above-noted elements of claim 24, even assuming *arguendo* a motivation to combine that reference with Irons and Vanko (which Appellant does not concede).

Appellant Requests Withdrawal of the § 103 Rejections of Claims 24, 41, 48, and 56

For at least the reasons above, the Examiner has failed to demonstrate that the proposed combination of cited references teaches or suggests each and every element of claim 24. Appellant thus respectfully submits that the Examiner has failed to make a *prima facie* case of obviousness with respect to that claim, *see* MPEP § 2143.03, and respectfully requests withdrawal of the § 103 rejections of claim 24 and its dependent claims. Further, while the other independent claims (41, 48, and 56) vary in scope from claim 24, Appellant requests withdrawal of the § 103 rejections of these independent claims and their respective dependent claims for at least similar reasons to those argued above with respect to claim 24.

(B) Dependent Claims 27 and 60

Claim 27 further recites "retrieving a given electronic document in the succession of electronic documents from the electronic storage using the corresponding unique time-based identifier for the given electronic document," and "wherein the time of day is specified by at least an hour value, a minutes value, and a seconds value." In Vanko, however, no such "seconds value" is taught or suggested, as Vanko's file simply has a three-character extension in which the "first two characters [of the file extension] represent the hour in military time," and "the third and last character represents the tens of minutes past the hour, like 1 for the period 3:10 through 3:19." *See* Vanko at col. 15, line 56 to col. 16, line 5. Appellant notes that while Vanko does mention a "number of seconds," this quantity is not part of the file name, but is simply part of the contents of the file. *See id.* at col. 27-56 and at Fig. 23. Appellant respectfully requests withdrawal of the § 103 rejection of claim 27 for at least the additional reasons above. Appellant further respectfully requests withdrawal of the § 103 rejection of claim 60 for at least similar reasons.

CONCLUSION

For the foregoing reasons, it is submitted that the Examiner's rejection of claims 24-30, 33, 35, 36, 41-45, 48-54, 56-63, 65-72, and 76-79 was erroneous, and reversal of the Examiner's decision is respectfully requested.

The Commissioner is authorized to charge the appeal brief fee of $620.00, the one month extension of time fee of $150, and any other fees that may be due to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5957-72402/AAC.

If any further extension of time (under 37 C.F.R. § 1.136) is necessary to prevent the above-referenced application from becoming abandoned, Appellant hereby petitions for such extension.

Respectfully submitted,

Date: October 5, 2011

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VIII. CLAIMS APPENDIX

The following lists claims 24-30, 33, 35, 36, 41-45, 48-54, 56-63, 65-72, and 76-79, incorporating entered amendments, as on appeal.

24. A method, comprising:

receiving a succession of electronic documents into a computer system, wherein each of the succession of electronic documents is received at a corresponding point in time; and

for each of at least a subset of the received electronic documents:

the computer system generating a corresponding unique time-based identifier identifying a date and time of day that the electronic document was received by the computer system;

the computer system storing, in an electronic storage, a respective plurality of attributes relating to the electronic document in each of a plurality of tables of a relational database accessible to the computer system, wherein at least one of the plurality of tables includes the generated unique time-based identifier as one of its respective plurality of attributes, wherein each of the plurality of tables is accessible using the generated unique time-based identifier, and wherein at least one of the plurality of tables includes a first attribute containing information indicating a location of a physical document corresponding to the electronic document; and

the computer system accessing the plurality of attributes for the electronic document in at least one of the plurality of tables using the corresponding unique time-based identifier for the electronic document.

25. The method of claim 24, wherein, for a given electronic document received by the computer system:

a first of the plurality of tables is configured to store a plurality of attributes relating to an entity originating the given electronic document; and

a second of the plurality of tables is configured to store a plurality of attributes relating to the location of a physical document corresponding to the given electronic document.

26. The method of claim 25, wherein a date and time of day at which a given electronic documents is received by the computer system corresponds to a date and time of day at which the first electronic document was created by imaging a physical document.

27. The method of claim 26, further comprising the computer system retrieving a given electronic document in the succession of electronic documents from the electronic storage using the corresponding unique time-based identifier for the given electronic document; and

wherein the time of day is specified by at least an hour value, a minutes value, and a seconds value.

28. The method of claim 24, wherein said receiving includes:

receiving imaged electronic documents; and/or

receiving computer generated electronic documents.

29. The method of claim 28, wherein the imaged electronic documents include electronic documents that were created by imaging corresponding physical documents, wherein after said imaging, each corresponding physical document is associated with a physical label or mark corresponding to a unique time-based identifier.

30. The method of claim 28, wherein the computer generated electronic documents include electronic documents received from one or more of the following sources: word processing programs, graphics programs, e-mail, facsimile transmissions.

33. The method of claim 24, further comprising:

accessing a first electronic document stored in the storage system using a first unique time-based identifier, wherein the first unique time-based identifier corresponds to a first date and time of day when the first electronic document was received into the document management system.

35. The method of claim 25, wherein:

a third of the plurality of tables is configured to store a plurality of attributes relating to a task associated with the given electronic document; and

a fourth of the plurality of tables is configured to store a plurality of attributes relating to the physical document that corresponds to the given electronic document, wherein an attribute in the fourth table includes a type of physical document.

36. The method of claim 35, wherein a fifth of the plurality of tables is configured to store a unique value for the given document, wherein the unique value is formed by a combination of a value of a first key of the first table and a value of a second key of the second table.

41. A document management system comprising:

an input unit configured to receive a succession of electronic documents, wherein each of the succession of electronic documents is received at a corresponding point in time;

a storage subsystem coupled to the input unit and configured to store the succession of electronic documents in an electronic storage using corresponding unique time-based identifiers;

a computer system coupled to both the input unit and the storage subsystem, wherein the computer system is configured, for each of at least a subset of the received electronic documents, to:

generate a unique time-based identifier corresponding to the point in time at which the electronic document was received into the document management system;

use the unique time-based identifier to store the electronic document in the storage subsystem; and

store a respective plurality of attributes relating to the electronic document in each of a plurality of tables of a relational database, wherein at least one of the plurality of tables includes the unique time-based identifier for the electronic document as one of its respective attributes, wherein each of the plurality of tables is accessible using the generated unique time-based identifier, and wherein at least one of the plurality of tables includes a first attribute containing information indicating a location of a physical document corresponding to the electronic document; and

access the plurality of attributes for the electronic document in at least one of the plurality of tables using the corresponding unique time-based identifier for the electronic document; and

wherein the electronic storage is configured to retrieve the succession of electronic documents using corresponding unique time-based identifiers.

42. The document management system of claim 41, wherein the input unit is configured to receive a first electronic document at a first point in time corresponding to a first date and a first time of day within the first date, wherein the computer system is configured to generate a unique time-based identifier for the first electronic document that corresponds to the first date and the first time of day.

43. The document management system of claim 41, wherein, for a given electronic document received by the input unit:

a first of the plurality of tables is configured to store a plurality of attributes relating to an entity originating the given electronic document; and

a second of the plurality of tables is configured to store a plurality of attributes relating to the location of a physical document corresponding to the given electronic document.

44. The document management system of claim 42, wherein a third of the plurality of tables is configured to store a plurality of attributes relating to a task associated with the given electronic document;

a fourth of the plurality of tables is configured to store a plurality of attributes relating to the physical document that corresponds to the given electronic document, wherein an attribute in the fourth table includes a type of physical document; and

a fifth of the plurality of tables is configured to store a unique value for the given document, wherein the unique value is formed by a combination of a value of a first key of the first table and a value of a second key of the second table.

45. The document management system of claim 42, wherein the first electronic document originated from an electronic document provided as input to the document management system.

48. A document management system, comprising:

first means for receiving a succession of electronic documents into a document management system, wherein each of the succession of electronic documents is received at a corresponding point in time;

second means for generating a unique time-based identifier for each of at least a subset of the received electronic documents, wherein the time-based identifier for each of at least a subset of the received electronic documents corresponds to a point in time at which the corresponding electronic document was received, wherein the second means is coupled to the first means;

third means for storing each of at least a subset of the received electronic documents using the corresponding time-based identifier, wherein the third means is coupled to the second means;

wherein the third means is configured to store, for each of the at least a subset of the received electronic documents, a respective plurality of attributes relating to that electronic document in each of a plurality of tables of a relational database, wherein at least one of the plurality of tables includes the generated unique time-based identifier as one of its respective plurality of attributes, wherein each of the plurality of tables is

accessible using the generated unique time-based identifier, and wherein at least one of the plurality of tables includes a first attribute containing information indicating a location of a physical document corresponding to that electronic document; and

fourth means for accessing, for a given one of the succession of electronic documents, the respective plurality of attributes for the given document in at least one of the plurality of tables using the corresponding unique time-based identifier for the given electronic document.

49. The document management system of claim 48, wherein a unique time-based identifier for a given one of the succession of electronic documents corresponds to a date and a time of day within that date that the given electronic document was received into the document management system.

50. The document management system of claim 48, wherein the succession of electronic documents includes one or more documents, each of which is converted from a corresponding first physical document.

51. The document management system of claim 48, wherein the succession of electronic documents includes one or more documents, each of which corresponds to an electronic document provided as input to the document management system.

52. The document management system of claim 48, wherein, for a given one of the succession of electronic documents:

a first of the plurality of tables is configured to store a plurality of attributes relating to an entity originating the given electronic document; and

a second of the plurality of tables is configured to store a plurality of attributes relating to the location of a physical document corresponding to the given electronic document.

53. The document management system of claim 52, wherein:

a third of the plurality of tables is configured to store a plurality of attributes relating to a task associated with the given electronic document; and

a fourth of the plurality of tables is configured to store a plurality of attributes relating to the physical document that corresponds to the given electronic document, wherein an attribute in the fourth table includes a type of physical document.

54. The document management system of claim 53, wherein a fifth of the plurality of tables is configured to store a unique value for the given document, wherein the unique value is formed by a combination of a value of a first key of the first table and a value of a second key of the second table.

56. A tangible computer readable memory medium having instructions stored thereon that are executable by a computing device to cause the computing device to:

receive a succession of electronic documents into a document management system, wherein each of the succession of electronic documents is received at a corresponding point in time;

generate a unique time-based identifier for each of at least a subset of the received electronic documents, wherein each unique time-based identifier corresponds to the point in time at which the corresponding electronic document was received;

store, in an electronic storage, and for at least one of at least the subset of the received electronic documents, a respective plurality of attributes relating to the at least one electronic document in each of a plurality of tables of a relational database accessible to the computing device, wherein at least one of the plurality of tables includes as one of its respective plurality of attributes the unique time-based identifier corresponding to the at least one electronic document, wherein each of the plurality of tables is accessible using the generated unique time-based identifier, and wherein at least one of the plurality of tables includes a first attribute containing information indicating a location of a physical document corresponding to the at least one electronic document; and

access the plurality of attributes for the at least one of the received electronic documents in at least one of the plurality of tables using the corresponding unique time-based identifier for the at least one electronic document.

57. The tangible computer readable memory medium of claim 56, wherein a unique time-based identifier for a first electronic document corresponds to a first-date and a first time of day at which the first electronic document was received into the document management system.

58. The tangible computer readable memory medium of claim 57, wherein the first electronic document corresponds to a first physical document converted into the first electronic document.

59. The tangible computer readable memory medium of claim 57, wherein the first electronic document originated from an electronic document provided as input to the document management system.

60. The tangible computer readable memory medium of claim 57, wherein the first time of day is specified at least by an hour value, a minutes value, and a seconds value.

61. The tangible computer readable memory medium of claim 56, wherein, for a given one of the succession of electronic documents:

a first of the plurality of tables is configured to store a plurality of attributes relating to an entity originating the given electronic document; and

a second of the plurality of tables is configured to store a plurality of attributes relating to the location of a physical document corresponding to the given electronic document.

62. The tangible computer readable memory medium of claim 61, wherein:

a third of the plurality of tables is configured to store a plurality of attributes relating to a task associated with the given electronic document; and

a fourth of the plurality of tables is configured to store a plurality of attributes relating to the physical document that corresponds to the given electronic document, wherein an attribute in the fourth table includes a type of physical document.

63. The tangible computer readable memory medium of claim 62, wherein a fifth of the plurality of tables is configured to store a unique value for the given document, wherein the unique value is formed by a combination of a value of a first key of the first table and a value of a second key of the second table.

65. The method of claim 24, wherein the received electronic documents include imaged electronic documents.

66. The document management system of claim 41, wherein the succession of electronic documents includes imaged electronic documents, and wherein the electronic storage is configured to retrieve a given one of the succession of electronic documents upon its unique time-based identifier being presented to the electronic storage.

67. The document management system of claim 48,

wherein the succession of electronic documents includes imaged electronic documents; and

wherein the third means is configured to retrieve a given stored electronic document upon its unique time-based identifier being presented to the third means.

68. The tangible computer memory medium of claim 56, wherein the succession of electronic documents includes imaged electronic documents, and wherein the electronic storage is configured to retrieve the at least one electronic document upon its unique time-based identifier being presented to the electronic storage.

69. The method of claim 36, wherein for each of at least a subset of the received electronic documents, the fifth table includes:

at least an attribute indicating a physical type of the corresponding physical document for that electronic document; and

an attribute indicating an input type associated with a method of creation for that electronic document.

70. The document management system of claim 44, wherein the computer system is further configured to, for each of the at least a subset of the received electronic documents, store in the fifth table a first attribute and a second attribute;

wherein the first attribute indicates a physical type of the corresponding physical document; and

wherein the second attribute indicates an input type associated with a method of creation for that electronic document.

71. The document management system of claim 54, wherein the fifth table is configured to store, for each of the at least a subset of the received electronic documents:

a first attribute indicating a physical type of the corresponding physical document for that electronic document; and

a second attribute indicating an input type associated with a method of creation for that electronic document.

72. The computer readable memory medium of claim 63, wherein the fifth table is configured to store, for each of the at least a subset of the received electronic documents: a first attribute indicating a physical type of the corresponding physical document for that electronic document; and

a second attribute indicating an input type associated with a method of creation for that electronic document.

76. The method of claim 24, wherein a first of the plurality of tables includes the unique time-based identifier as an attribute, and wherein the first table is accessible using the unique time-based identifier as a primary key of the first table.

77. The document management system of claim 41, wherein a first of the plurality of tables includes the unique time-based identifier as an attribute, and wherein the first table is accessible using the unique time-based identifier as a primary key of the first table.

78. The document management system of claim 48, wherein a first of the plurality of tables includes the unique time-based identifier as an attribute, and wherein the first table is accessible using the unique time-based identifier as a primary key of the first table.

79. The tangible computer readable memory medium of claim 56, wherein a first of the plurality of tables includes the unique time-based identifier as an attribute, and wherein the first table is accessible using the unique time-based identifier as a primary key of the first table.

IX. EVIDENCE APPENDIX

No evidence submitted under 37 CFR §§ 1.130, 1.131 or 1.132 or otherwise entered by the Examiner is relied upon in this appeal.

X. RELATED PROCEEDINGS APPENDIX

As of the filing of this brief, no decision has been reached by a court or the Board in the appeal of U.S. Application 10/914,481 or the appeal of U.S. Application 11/513,846.